

333 Earle Ovington Boulevard, Suite 402 Uniondale, New York 11553 T: 516-203-7600 F: 516-282-7878

April 16, 2025

Via ECF

Hon. Jennifer L. Rochon UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK 500 Pearl Street New York, New York 10007 The Court GRANTS the requested extension. Plaintiff shall submit her motion for default judgment by May 12, 2025.

Date: April 16, 2025

New York, New York

SO ORDERED.

JENNIFER L. ROCHON United States District Judge

Re: Brigitte Stelzer v. The Publisher Desk LLC

Docket No: 1:25-cv-01401-JLR

Dear Judge Rochon:

We are the attorneys for Plaintiff in this matter and write to respectfully request an extension of three weeks' time to file the Motion for Default Judgment on the above referenced matter.

As a matter of background: This matter commenced with a filing of the Complaint on February 19, 2025 (Dkt. No. 1). The Summons, Complaint and supporting documents were served on Defendant on February 26,2025, through the Secretary of State. The Affidavit of Service was filed with the Court on the same day (Dkt. No. 8). The deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint was due to be filed by March 19, 2025. Defendant failed to respond by that date. Thereafter, the Court extended the deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint to April 6, 2025 (inputted by text entry). Defendant failed to appear or answer by that date. Therefore, Plaintiff filed the Request for Certificate of Default, along with its supplemental documents, on April 9, 2025 (Dkt. No. 12-13).

The Request for Certificate of Default, along with its supporting documentation, was served on Defendant both by regular and electronic mail on the same day. The Certificate of Service was thereafter filed with the Court on the same day as well (Dkt. No. 14). Later that day the Defendant responded to the email communications sent by our office and essentially stated that they would not be appearing in this action. This information was set forth in more detail in my letter to the Court dated April 10, 2015 (Dkt. No. 16).



PAGE 2

On April 16, 2025 Your Honor provided, by text Order, that the Motion for Default Judgment be filed by April 21, 2025. Due to my current case-load, which includes motion practice and Court appearances on multiple matters, I am respectfully requesting an extension of three weeks' time to properly prepare the motion and have an opportunity to confer with my client.

Thank you for your consideration of this request. I look forward to further instructions from Your Honor on this matter.

Respectfully submitted,

/s Dina Nouhian Dina Nouhian